CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 91-037

NPDES NO. CA0029793

WASTE DISCHARGE REQUIREMENTS FOR:

TECHNICAL COATINGS COMPANY AND
BENJAMIN MOORE AND COMPANY
1000 WALSH AVENUE
SANTA CLARA, SANTA CLARA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board) finds that:

1. Technical Coatings Company (hereinafter referred to as a discharger), a wholly owned subsidiary of Benjamin Moore and Company, by application dated September 25, 1990, and supplements of early 1991, has applied for issuance of waste discharge requirements under the National Pollutant Discharge Elimination System (NPDES).

2. The discharger owns and operates a paint manufacturing facility located at 1000 Walsh Avenue, Santa Clara, Santa Clara County. Prior to development as a paint manufacturing facility in 1950, the site was used for agricultural purposes, presumably a fruit orchard.

3. In March of 1983 organic solvents were detected in the soil and shallow groundwater in the immediate vicinity of an underground tank farm. Tank contents were removed after pollution was discovered. It has been reported that 13 of the 14 tanks and some polluted soil were excavated during the period August 5 through September 18, 1985. (The one remaining tank was filled with cement; thus all 14 tanks were removed from service.)

   Subsequent subsurface investigations by the discharger have revealed organic-chemical pollution in soils and groundwater beneath and downgradient of the site.

4. Early chemical analyses identified more than 25 pollutants at this site. There are approximately ten chemicals of concern at present; analytical results indicate up to 3100 ppm (parts per million) methyl isobutyl ketone, 140 ppm toluene, and 620 ppm total xylene in groundwater. Benzene has been detected in groundwater offsite at 14 ppm. Other chemicals detected in soil and groundwater samples include ethylbenzene,

methyl ethyl ketone, vinyl chloride, 1,1,1-trichloroethane, 1,1-dichloroethane, and trichloroethene.

5. Interim remedial actions are being implemented at this site pursuant to site cleanup requirements of Board Order No. 89-160. The discharger has installed two groundwater interceptor trenches and 13 groundwater extraction wells. Groundwater is being extracted at the present time, and is temporarily being discharged to the sanitary sewer after treatment by a Detox biological treatment plant and onsite use. Future remediation efforts require that extracted groundwater will continue to be treated by use of the onsite Detox plant prior to reuse, and/or discharge to a storm sewer which is tributary to the Guadalupe River and South San Francisco Bay if discharge to the sanitary sewer is no longer allowed.

   The Detox unit treats waste by providing a favorable environment for the growth of bacteria which become involved in the biochemical oxidation of organic compounds. After treatment in a properly operated Detox unit, concentrations of organic compounds are reduced to nondetectable (ND) concentrations in the waste effluent. The final products after treatment are identified as carbon dioxide, water, and more bacteria.

6. The discharger has considered the feasibility of reclamation and/or reuse of extracted groundwater, or discharge to a publicly owned treatment works (POTW), as specified in Regional Board Resolution No. 88-160; and proposes that, of an estimated daily average of 4,000 gpd (gallons per day) groundwater to be extracted and treated, about 2,150 gpd will be reused onsite and the remainder will be discharged. The discharger will continue to investigate ways of reusing or reclaiming 100% of the extracted groundwater. The discharger has installed a 10,000-gallon-capacity above-ground tank to store treated groundwater for onsite use. Excess produced water will be discharged to the storm drain as allowed by this permit.

7. The discharger also proposes to discharge collected wastewater, following natural aeration by storage in an evaporation pond. The discharger reports that, in the Spring of 1990, an evaporation pond with a capacity of approximately 300,000 gallons was built at the site to contain and evaporate waste slurry, and that the pond is lined with 60-mil-thick HDPE geomembrane that directly overlies a compacted subgrade composed of native clayey soils.

8. Waste slurry was produced as a consequence of implementing groundwater cleanup. The two interceptor trenches constructed to extract polluted groundwater (Finding 5) are each about three feet wide and 33 feet deep. The depth of the trenches

made it necessary to maintain a viscous slurry in them during construction to support the excavations. Once the excavation reached design depth, a granular backfill was placed through the slurry and the slurry was pumped to the evaporation pond. Sections of the trenches were excavated in soils containing organic chemicals and some chemicals may have been released to the slurry during construction of the trenches.

The slurry was made by adding city water to a starch-like organic polymer; afterwards, the spent slurry consisted of water and simple sugars. About 167,000 gallons of slurry-bearing groundwater were pumped from the trenches to the evaporation pond. As of January 18, 1991, the pond contained about 193,400 gallons of wastewater composed of spent slurry, wash water used to clean out Baker Tanks that held the slurry, trench-flushing and recirculation water, and polluted groundwater that entered the trenches during construction.

9. The discharger has tested the pond water, concludes that it is suitable for surface discharge, and proposes to completely empty the liquid contents of the pond by discharge to the storm sewer as allowed by this permit. After the liquid contents have been completely removed, the pond will be closed as required. This permit will allow the mixture of pond water and slurry to be discharged, provided that the fluid is tested as required by the permit and meets permit limits. If the fluid does not meet permit requirements, it shall not be discharged and will be treated as necessary for discharge to occur.

   The discharge of pond water will be limited to a finite amount, that which is presently in storage in the pond and as may be augmented only by natural precipitation falling on the pond. The pond shall be empty within six months after this permit becomes effective.

10. Immediately prior to the beginning of discharge from the pond, at least four samples of pond water will be collected during one sampling event, one from each quadrant of the pond, and composited for analysis. Discharge will commence by means of a pump and discharge line to a storm drain, after analytical results show that the discharge will meet permit requirements. For the first 30 days of discharge either composite samples of pond water or samples from the pond discharge line will be collected and analyzed every five days during pond discharge. After the first 30 days, sampling and analysis will be conducted every sequential 15 days during pond discharge, until the pond has been emptied of all liquid contents.

    Pond water meeting discharge requirements as a result of treatment by evaporation will be discharged directly to the storm sewer, without further treatment by the Detox unit.

11. The Regional Board adopted a revised Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) on December 17, 1986. The Basin Plan contains water quality objectives for the Guadalupe River and South San Francisco Bay.

12. The existing and potential beneficial uses of Guadalupe River, South San Francisco Bay, and contiguous surface waters are:

- Navigation
- Contact and non-contact water recreation
- Warm fresh water habitat
- Cold fresh water habitat
- Wildlife habitat
- Preservation of rare and endangered species
- Fish spawning and migration
- Shellfish harvesting
- Estuarine habitat
- Ocean commercial and sport fishing
- Industrial service supply

13. The existing and potential beneficial uses of groundwater resources in the Santa Clara Valley groundwater basin are:

- Municipal and domestic supply
- Industrial process supply
- Industrial source supply
- Agricultural supply

14. The Basin Plan prohibits discharge of wastewater which has "particular characteristics of concern to beneficial uses" (a) "at any point in San Francisco Bay south of the Dumbarton Bridge" and (b) "at any point where the wastewater does not receive a minimum initial dilution of at least 10:1 or into any nontidal water, dead-end slough, similar confined water, or any immediate tributary thereof".

15. The Basin Plan allows for exceptions to the prohibitions referred to in Finding 14 above when it can be demonstrated that a net environmental benefit can be derived as a result of the discharge.

16. Exceptions to the prohibitions referred to in Finding 14 are warranted because this discharge is an integral part of a program to clean up polluted ground water and thereby produce an environmental benefit, and because receiving water concentrations are expected to be below levels that would affect beneficial uses. Should studies indicate chronic effects, not currently anticipated, the Board will review the requirements of this Order based upon Section C.1.e.

17. The Basin Plan prohibits discharge of "all conservative toxic and deleterious substances, above those levels which can be achieved by a program acceptable to the Board, to waters of the Basin". The discharger's groundwater extraction and treatment systems and associated operation, maintenance, and monitoring plans constitute an acceptable control program for minimizing the discharge of toxicants to waters of the State.

18. Discharge of waste is a privilege, not a right. Authorization to discharge is conditional upon the discharge complying with provisions of Division 7 of the California Water Code and any other more stringent limitations to implement basin plans, protect beneficial uses, and prevent nuisance.

18. Effluent limitations of this Order are based on the Clean Water Act, Basin Plan, State and U. S. Environmental Protection Agency (EPA) plans and policies, and best engineering and geologic judgement. EPA Region IX draft guidance "NPDES Permit Limitations for Discharge of Contaminated Groundwater: Guidance Document" was also considered in the determination of effluent limits.

19. The issuance of waste discharge requirements for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.

20. The Board has notified the discharger and interested agencies and persons of its intent to issue waste discharge requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.

21. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the discharger, its agents, successors, and assigns, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following:

A. DISCHARGE PROHIBITIONS

1. Neither the treatment nor the discharge of pollutants shall create pollution, contamination, or nuisance as defined by Section 13050 of the California Water Code.

2. The discharges shall be limited to wastewater presently stored in the onsite evaporation pond and natural precipitation falling on the pond, and treated

groundwater and added chemicals as may be required which do not adversely affect the environment and comply with requirements of this Order.

3. The maximum discharge flows shall not exceed the following amounts without prior approval of the Executive Officer:

Discharge from evaporation pond	20,000 gpd
Discharge of treated extracted groundwater	10,000 gpd

B. EFFLUENT LIMITATIONS

1. The effluent, at the discharge point to the storm drain, shall not contain constituents in excess of the limits contained in Table 1:

Table 1

Constituent	Instantaneous Maximum (µg/l)
Purgeable Halocarbons	
methyl isobutyl ketone	5
methyl ethyl ketone	5
trichloroethene	5
1,1,1-trichloroethane	5
1,1-dichloroethane	5
vinyl chloride	0.5
Purgeable Aromatics	
toluene	5
benzene	1
total xylenes	5
ethylbenzene	5
Total concentration of Halogenated, Nonhalogenated and Aromatic Volatile Organic Compounds	5
Purgeable Aliphatics	
Total Petroleum Hydrocarbons	50
Metals	
arsenic	20
cadmium	10
chromium (VI)	11
copper	20
lead	5.6
mercury	1

nickel	7.1
silver	2.3
zinc	58

2. The pH of the discharge shall not exceed 8.5 nor be less than 6.5.

3. In any representative set of samples, the discharge shall meet the following limit of quality:

   Toxicity: The survival of rainbow trout in 96-hour bioassays of the effluent as discharged shall be a median of 90% survival and a 90 percentile value of not less than 70% survival.

C. RECEIVING WATER LIMITATIONS

1. The discharge of wastes shall not cause the following conditions to exist in waters of the State at any place:

   a. floating, suspended, or deposited macroscopic particulate matter or foam;

   b. bottom deposits or aquatic growths;

   c. alteration of temperature or apparent color beyond present natural background levels;

   d. visible, floating, suspended, or deposited oil or other products of petroleum origin;

   e. toxic or other deleterious substances to be present in concentrations or quantities which will cause deleterious effects on aquatic biota, wildlife, or waterfowl, or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentrations.

2. The discharges of waste shall not cause the following limits to be exceeded in waters of the State in any place within one foot of the water surface:

   a. pH: The pH shall not be depressed below 6.5 nor raised above 8.5, nor caused to vary from normal ambient pH levels by more than 0.5 units.

   b. Dissolved oxygen: 5.0 mg/l minimum. The median dissolved oxygen concentration for any three consecutive months shall not be less than 80% of the dissolved oxygen content at saturation. When natural factors cause lesser concentration(s) than

specified above, the discharge shall not cause further reduction in the concentration of dissolved oxygen.

c. Un-ionized ammonia (as N): 0.025 mg/l annual mean and 0.4 mg/l maximum.

3. This discharge shall not cause a violation of any applicable water quality standard for receiving waters adopted by the Board or the State Water Resources Control Board as required by the Federal Water Pollution Control Act and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the Federal Water Pollution Control Act or amendments thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

D. PROVISIONS

1. The discharger shall comply with all sections of this order immediately upon adoption by the Board and upon starting any discharge.

2. The discharger shall comply with the self-monitoring program as adopted by the Board and as may be amended by the Executive Officer.

3. The discharger shall close the evaporation pond pursuant to State and Federal regulations immediately after the pond has been emptied of all liquid contents. The discharger shall submit a complete proposal for pond closure, including soil investigation, within 30 days after adoption of this Order. The proposal will include a time schedule for implementation and project completion.

4. The discharger shall reclaim and/or reuse the maximum amount of effluent that is technically and economically feasible to be reclaimed and/or reused.

5. The discharger shall notify the Regional Board if any activity has occurred or will occur which would result in the discharge, on a frequent or routine basis, of any toxic pollutant which is not limited by this Order.

6. Any discharge to a location other than the discharge point(s) specified in this Order will require a modification to this Order or submission of a second NPDES application.

7. In addition to the required monthly self-monitoring reports and annual report, the discharger shall also submit periodic reports about the evaporation pond, and on efforts to reclaim or reuse extracted groundwater. Both reports may be combined with other reports: the report about the pond with the monthly report, and the report on efforts to reclaim or reuse extracted groundwater, with the annual report.

   The report about the pond shall describe the contents of the pond for the previous month, on a weekly basis prior to discharge and a daily basis after discharge from the pond commences. This reporting shall continue until the pond has been emptied of all liquid contents, and shall replace the report for the Interceptor Trench Slurry Evaporation Pond sbmitted weekly. The latter report will no longer be required when the required information is included in the monthly reports. The status of the pond will be described in monthly reports until the pond has been properly closed and all regulatory concerns have been adequately addressed.

8. On an annual basis the discharger shall submit a report describing efforts to reuse and/or reclaim all or part of the extracted groundwater, to address the concerns expressed by Regional Board Resolution No. 88-160, Regional Board Position on the Disposal of Extracted Groundwater From Groundwater Cleanup Projects. The initial report, to be submitted by June 1, 1991, shall be a report of all efforts up to the end of calendar year 1990. Future reports shall be submitted by February 1 of the current year, beginning in 1992, and shall be for the previous calendar year.

9. The discharger shall develop and submit a BMP (Best Management Practices) program acceptable to the Executive Officer by September 30, 1991. The BMP program shall be consistent with the EPA regulation 40 CFR 125, Subpart K and the general guidance contained in the "NPDES Best Management Guidance Document", EPA Report No. 600/9-79-45, December 1979 (revised June 1981). A BMP program acceptable to the Executive Officer shall be implemented by March 31, 1992.

10. The discharger shall submit an operation and maintenance plan for the treatment system by July 1, 1991.

11. The discharger shall comply with all items of the attached "Standard Provisions, Reporting Requirements and Definitions" dated December 1986.

12. Any noncompliance with a requirement of this Order shall be reported as stated in Section C.10 of the "Standard Provisions, Reporting Requirements and Definitions" referred to above.

13. This Order shall serve as a National Pollutant Discharge Elimination System Permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.

14. This Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, nor protect the discharger from his liability under Federal, State or local laws, nor create a vested right for the discharger to continue the waste discharge.

15. Provisions of these waste discharge requirements are severable. If any provision of these requirements is found to be invalid, the remainder of these requirements shall not be affected.

16. This permit may be modified prior to the expiration date to include effluent limitations for toxic constituents determined to be present in significant amounts in the discharge through the comprehensive monitoring program included as part of this Order.

17. This Order expires March 20, 1996. The discharger must file a report of waste discharge in accordance with Title 23, Chapter 3, Subchapter 9 of the California Administrative Code no later than 180 days in advance of such expiration date as application for issuance of new waste discharge requirements.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region on March 20, 1991.

STEVEN R. RITCHIE
Executive Officer

Attachments:

Standard Provisions, Reporting Requirements and Definitions, December, 1986

Self-Monitoring Program

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

TECHNICAL COATINGS COMPANY AND
BENJAMIN MOORE & COMPANY

1000 WALSH AVENUE
CITY OF SANTA CLARA
SANTA CLARA COUNTY

NPDES NO. CA0029793

ORDER NO. 91-037

CONSISTS OF

PART A, dated December 1986
(modified January 1987)

and

PART B

PART B

I. DESCRIPTION OF SAMPLING STATIONS

A. INFLUENT

Station	Description
I-1	At a point in the groundwater extraction/treatment system immediately prior to treatment.

B. EFFLUENT

Station	Description
E-1	At a point in the groundwater extraction/treatment system immediately following treatment.
E-2	At a point in the evaporation pond discharge line before discharge to the storm sewer. The initial sample shall be composited from four samples, one collected in each quadrant of the pond.

C. RECEIVING WATERS

Station	Description
C-1	At a point in the Guadalupe River 300 feet but not more than 600 feet downstream from the discharge point.

II. SCHEDULE OF SAMPLING AND ANALYSIS

A. The schedule of sampling and analysis shall be that as shown in Table I attached.

III. MODIFICATION OF PART A, DATED JANUARY 1987

All items of Self-Monitoring Program Part A, dated December 1986 and as modified January 1987, and as supplemented herein, shall be complied with:

A. Additions to Part A: Section G.4.d.5: "In the annual open-scans for effluent samples, all chromatic peaks for purgeable halocarbons and/or volatile organics shall be

identified and quantified. If previously unquantified peaks are identified in any sample, these peaks shall be confirmed within four weeks or at the next sampling event based on analyses of samples using chemical standards necessary to achieve proper identification and quantification.

"Results from each required analysis and observation, including any confirmatory analysis, shall be submitted as laboratory originated data summary sheets in the monthly self-monitoring reports. Results shall also be submitted for any additional analyses performed by the discharger at the specific request of the Board for parameters for which effluent limits have been established and provided to the discharger by the Board, and shall be submitted with the report for the month in which the analysis was made."

B. Modifications to Part A: for the following, the discharger shall comply with the Sections as changed and reported herein.

1. Section D.2.a. is changed to read:

   Samples of effluent and receiving waters shall be collected at times coincident with influent sampling unless otherwise stipulated. The Regional Board or Executive Officer may approve an alternative sampling plan if it is demonstrated that expected operating conditions warrant a deviation from the standard sampling plan.

2. Section D.2.d. is changed to read:

   If two consecutive samples of any one constituent or parameter monitored on a weekly, monthly, or other periodic basis in a 30-day period exceed the effluent limit or are otherwise out of compliance, or if the required sampling frequency is once per month or less (quarterly, annually or other) and the sample or parameter exceeds the limit or is otherwise out of compliance, the discharger shall implement procedure(s) acceptable to or approved by the Board Executive Officer, on a case by case basis.

3. Section D.2.e. is changed to read:

   If any instantaneous maximum limit is exceeded, the discharge shall terminate immediately upon discovery of the excess, and shall not resume until the cause of the violation is found and corrected

and/or the Board Executive Officer authorizes resumption of the discharge.

4. In Section F.1, the phrase "(at the waste treatment plant)" is changed to read, "(at the discharger's facility at 1000 Walsh Avenue in Santa Clara)".

5. Information requested in Section G.4.e. shall be prepared in a format similar to EPA form 3320-1 and submitted only to the Regional Board.

6. The Annual Report required in Section G.5. shall be submitted in place of the end of the year monthly report.

7. The GC/MS scan required once annually at E-1 shall be substituted for the monthly organic chemical analysis at this sampling station during the months when the GC/MS scan samples are collected.

IV. MISCELLANEOUS REPORTING

A. If any chemicals or additives are proposed to be used in the operation and/or maintenance of the extraction/treatment system, the discharger shall obtain the Board's concurrence prior to use. The details concerning such approved use shall be reported in the next periodic report submitted to the Board.

I, Steven R. Ritchie, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

1. Has been developed in accordance with the procedures set forth in this Regional Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Regional Board Order No. 91-037.

2. Was adopted by the Board on March 20, 1991.

3. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the discharger, and revisions will be ordered by the Executive Officer or Regional Board.

STEVEN R. RITCHIE
Executive Officer

Attachment: Table I

TABLE I

SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS

Sampling Station	I-1	E-1	E-2	C-1
Type of Sample	G	G	K/G	G
Flow rate (gpd)	D		D	
Total Suspended Matter (mg/l & kg/day)		Q:E	P/R	
Fish Tox'y 96-hr. % Surv'l in undiluted waste		Y:E	Y/Y	
Ammonia Nitrogen (mg/l & kg/day) {1}				
pH (units)	A/2Y and M:E	A/2Y and M:E	P/R	2Y:E and Z
Dissolved Oxygen (mg/l & Saturation)		2Y:E	Y/Y	2Y:E and Z
Temperature (Centigrade)		Q:E	P/R	2Y:E and Z
Metals (Standard Methods For Priority Pollutants) {2}		Y	Y/Y	
Identifiable Organic Chemicals {3}	A/2Y and M:E	A/2Y and M:E	P/R	2Y:E and Z
GC/MS Open Scan (EPA Method 624/625)		Y	Y/Y	
Total Petroleum Hydrocarbons-Purgeable Aliphatics (EPA Modified Method 8015)		Y	Y/Y	

LEGEND FOR TABLE I

Type of Station

I = intake and/or water supply station
E = waste effluent station
C = receiving water station

Type of Sample

G = grab sample
K = composited sample

Frequency of Sampling

A = initially, within 30 days after permit becomes effective
D = once each day during normal operations; the first measurement after a non-working day will represent the cumulative flow after the last previous measurement
M = once each month
M:E =same as M but only when effluent from E-1 is discharged to storm sewer
P = periodic; initially just prior to beginning discharge from pond, and once every five days during first 30 days of discharge from pond thereafter
Q = quarterly, once in March, June, September, and December
Q:E =same as Q but only when effluent from E-1 is discharged to storm sewer
R = periodic; once every sequential 15 days after the first 30 days of pond discharge until pond is empty
Y = once each year
Y:E =same as Y but only when effluent from E-1 is discharged to storm sewer
Y/Y =initially, just prior to beginning discharge
2Y =once in March and once in September
2Y:E =same as 2Y but only when effluent from E-1 is discharged to storm sewer
Z = periodic; initially at beginning of pond discharge and once every 10 days of pond discharge thereafter

REMARKS FOR TABLE I

{1} Total ammonia nitrogen shall be analyzed and un-ionized ammonia calculated whenever fish bioassay test results fail to meet the specified percent survival.

{2} Metals refers to inorganic chemicals so identified and listed as priority pollutants by the EPA, and include but are not limited to the following:

arsenic	mercury
cadmium	nickel
chromium (VI)	silver
copper	zinc
lead	

{3} Identifiable Organic Chemicals refers to volatile organic compounds and associated organic constituents and compounds, whether identified as chlorinated, halogenated, or otherwise, and include but are not limited to the following:

methyl isobutyl ketone
methyl ethyl ketone
trichloroethene
1,1,1-trichloroethane
1,1-dichloroethane
vinyl chloride
toluene
benzene
total xylenes
ethylbenzene

Any other organic constituents identified during or as a result of required analyses, and concentrations detected, shall be reported.

Concentrations detected may be reported in micrograms per liter (ug/l) or parts per billion (ppb), or in other commonly acceptable units of measurement. The unit of measurement will be clearly provided with the analysis.